

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE: AMERICAN MEDICAL  
COLLECTION AGENCY, INC.,  
CUSTOMER DATA SECURITY  
BREACH LITIGATION

*This Document Relates To:  
Other Labs Track*

Case No. 2:19-MD-02904-MCA-MAH

MDL 2904

**DECLARATION OF BRADLEY  
BARTOLOMEO IN SUPPORT OF  
MOTION TO ADMIT PRO HAC  
VICE**

I, Bradley Bartolomeo, Esq., declare as follows subject to the penalties of perjury:

11. I am an attorney and partner with the firm of Lewis Brisbois Bisgaard & Smith LLP, co-counsel for Defendants Sonic Healthcare USA, Clinical Pathology Laboratories, Inc., Aurora Diagnostics LLC, and Austin Pathology Associates (“Sonic Defendants”).

12. I submit this Declaration in support of the Sonic Defendants’ application for an Order admitting Abaigeal D. Franson, Esq., as counsel pro hac vice in the above captioned matter, pursuant to Local Rule 101.1(c). I am personally familiar with the facts set forth in this Declaration.

13. I am a member in good standing of the New Jersey Bar, having been admitted in 2007, and am also a member of good standing of the United States District Court for the District of New Jersey.

14. The proposed Order sets forth that all pleadings, briefs and papers filed with the Court will be signed by Lewis Brisbois Bisgaard & Smith LLP as attorneys of record, and we will be responsible for the conduct of this action and of counsel as set forth in Local Rule 101.1(c).

15. For the foregoing reasons, I respectfully request that the Court enter the proposed Order to admit pro hac vice Abaigeal D. Franson, Esq.

16. I certify that the foregoing statements made by me are true, and I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: May 19, 2025

/s/ Bradley Bartolomeo  
Bradley Bartolomeo